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Commentary

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The Environment

Shades of Green:

Gauging Canada's *Green Plan*

by

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The environmental *Green Plan* recently tabled by the Mulroney government is one of the most ambitious and interventionist policy prescriptions in recent Canadian political history.

The $3 billion, five-year regulatory and policy action plan can be assessed against six criteria, or "shades of green": key environmental policy needs, the green plans of other industrialized countries, the standards and expectations of the single-interest environmental lobby, current economic realities, previous "megapolicy" initiatives, and the larger geopolitics of Canadian unity.

On these criteria, the *Green Plan* warrants a decidedly mixed grade. It deserves support for the way in which it commits the federal government to changes in its decisionmaking process, to better consultation in standards setting, and to strengthening the scientific base of the Department of the Environment.

The *Green Plan* fails the larger test of economic and environmental relevance, however, because it avoids a serious commitment to the use of market-based instruments as a complement to traditional regulation.

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Introduction

The long-awaited federal *Green Plan*, released in the pre-Christmas calm before the storm of the Gulf War, is an ambitious and challenging one. Indeed, one has to go back to the immediate post-World War II era, when economic reconstruction and early Keynesian plans were announced, or perhaps more recently to the National Energy Program of 1980, to find a government prepared to admit that it was "planning" anything so ambitious. That it comes from a Progressive Conservative government that has otherwise spent most of its first seven years in office trimming the powers of the state is all the more remarkable.

The *Green Plan*, which was preceded by an extensive series of public meetings with business, environmental groups, and Canadians in general, sets out a comprehensive series of goals, over 100 specific initiatives, $3 billion in new federal money, and defined targets and schedules.[1]

The plan includes commitments to regulate 44 priority toxic substances in five years and to reduce the generation of waste in Canada by 50 percent by 2000. Significantly, it contains no environmental or carbon taxes. The plan commits the federal government to major changes in its internal decisionmaking processes and in public education and participation. It formally advocates the concept of environmentally sustainable, renewable resource management in the forestry, agriculture, and fisheries sectors. As shown in greater detail below, the plan indicates a massive expenditure program by both the Department of the Environment (DOE) and other federal government agencies. It also involves leveraged private sector spending of even larger amounts of money.

The art of gauging the *Green Plan*, which is easily the most far-reaching environmental initiative in Canada's history, is bedeviled by the presence of several contending criteria for determining relative success or failure. There are, in short, many shades of green. How, then, does the *Green Plan* fare:

- against specific environmental policy needs?
- against the green plans of other countries?
- against the standards and expectations of the single-interest environmentalist lobby?
- against the realities and opportunities posed by current economic conditions?
- against similar, previous "megapolicy" initiatives? and
- against the larger geopolitics of Canada in the 1990s?

This *Commentary* gauges the *Green Plan* in relation to all of these shades of green, and begins by relating it to several specific environmental policy needs.

Specific Environmental Policy Needs

In earlier assessments of federal environment policy, I identified several specific policy needs if real environmental progress is demonstrably to occur in the 1990s.[2] The *Green Plan* is an improvement on previous federal efforts with regard to three of these policy needs, but it fails the test on the most important of them.

The document's most serious flaw is its failure to demonstrate a serious commitment to the use of market-based policy instruments as a complement to traditional regulation. There is the obligatory mention of such devices as tradable pollution permits and environmental taxes, but no indication of why these devices are essential if there is to be any hope of achieving the scale of change needed — and at optimum social cost in an increasingly competitive world. The relationship between traditional regulation and market incentives is key, but federal environmental policymakers seem to have buried these issues in the deeper recesses of the *Green Plan* so as not to offend environmentalists or some business interests.

Indeed, the *Green Plan* makes little attempt to relate the policies it advocates to the fact that Canada, to a far greater extent than most of its trading partners and competitors, is still very much a resource-dependent northern

economy. The costs and benefits of phasing in sustainable resource management are not at the forefront of the *Green Plan* despite the obvious difficulties the Canadian economy is facing.

As for the other main environmental policy needs, the *Green Plan* deserves higher marks. It contains a commitment to strengthening DOE's scientific base and to making environmental data and information publicly available. It promises better consultation in standards-setting processes and better environmental assessment of all federal cabinet decisions — indeed, this has occurred with increasing regularity in recent years.[3] Finally, the *Green Plan* contains far more evidence that federal policymakers are setting specific environmental priorities, although the rationale for these priorities is not always well explained and the schedules that are set reveal more wishful thinking than realistic planning.

To obtain a better sense of some of these issues requires a more detailed look at the *Green Plan*'s contents. And to put the document in perspective, I shall compare it with Britain's green plan, which the Thatcher Conservative government released a few weeks prior to Canada's plan.[4]

Canada's *Green Plan* in Comparative Perspective

Rather than compare the *Green Plan* with those of three or four other countries at a general level, it may be more instructive to compare it in greater detail with just one other country. The British case is particularly useful in this sense, not only because it is an advanced industrial country and shares a common parliamentary system of government, but also because, throughout the past decade, a Conservative government has been in power there that has advocated pro-market policies even more ardently than has the Mulroney government.

Obviously, direct comparisons must proceed with some caution given the differences between Canada and Britain. Not least of these are the contrasts between an island and a continental land mass, and between a unitary and a federal state. Nevertheless, a comparative perspective helps to gauge the *Green Plan* against a second test of relevance. Box 1 sets out the main chapters in the two planning documents, and thus conveys something of how the basic arguments are marshalled and what each government deemed to be important as to goals and principles.

Canada's *Green Plan* begins with a broad commitment to the concept of "sustainable development," calling it no less than an effort at "planning for life," the essentials of which are air, water, and land. It then links this commitment successively with renewable resources, special areas and species, and the great, fragile Arctic, all of which can be seen as being part of this country's continental vastness and of Canadians' special environmental image of themselves. Only then does the *Green Plan* focus on the global imperatives of environmental policy. This is followed by a firm undertaking to change the decisionmaking process of all political and economic institutions so as to deal with environmental issues as a forethought rather than as an afterthought. Emergency preparedness is the last of the topics with which the *Green Plan* deals — not to give it short shrift, but to convey the message that the old days of reactive cleanups will soon be replaced by preventative and more systematic approaches.

The British document styles itself as an "environmental strategy" for Britain. It contains no explicit early endorsement of the concept of sustainable development; rather, there is a more pragmatic defense of the notion that both economic growth and "environmental good sense" are possible. It lists the concept of "stewardship" among the first principles of the government's approach, as well as the need to deal with "fact, not fantasy." The document notes that precautionary action is needed, but there is a stouter initial defense of the value of traditional regulation. It then emphasizes the issue of the greenhouse effect and global warming. This no doubt reflects the Thatcher

Box 1

The Canadian and British Green Plans at a Glance

The Canadian Plan

Overview
- Our Planet, Our Nation, Ourselves
- A Partnership for Change
- Principles for Environmental Action
  - — Respect for Nature
  - — The Economy-Environment Relationship
  - — Efficient Use of Resources
- Shared Responsibility
- Leadership
- Informed Decision-Making
- We Must Think, Plan, and Act in Terms of Ecosystems

Life's Three Essentials: Air, Water, Land

Sustaining Our Renewable Resources

Special Spaces and Species

Canada's Special Stewardship: The Arctic

Global Environmental Security

Environmentally Responsible Decision-Making

Starting in Our Own House

Emergency Preparedness

The British Plan

The Government's Approach
- First Principles
  - — Coherent Policies
  - — The Pace of Change
  - — International Dimension
  - — Environmental Problems in Our Daily Lives
  - — Stewardship
  - — Fact, Not Fantasy: Best Evidence
  - — Precautionary Action
  - — Public Information
  - — International Cooperation
  - — The Best Instruments
  - — Regulation
  - — Market Forces
  - — Implications for People

The Greenhouse Effect

Town and Country

Pollution Control

Awareness and Organization

Scotland, Wales, and Northern Ireland

government's belated interest in environmental policy, but it also reflects the obvious need in the British context for international cooperation as Britain's economy becomes more closely integrated with those of its partners in the European Community. A separate chapter on town and country reflects not only Britain's greater involvement in local government, but also the political sensitivity of the compact but picturesque green countryside. Britain may be a nation of shopkeepers, as Napoleon once pointed out, but it is also a nation of walkers, cyclists, and gardeners. The British plan concludes with a section on new decisionmaking approaches, but it is cast more modestly than its Canadian counterpart in terms of improved information and consultation. Necessarily, it also sets out regional imperatives for Scotland, Wales, and Northern Ireland.

Even at this general and philosophical level, Canada's *Green Plan* is a more comprehensive and complete approach, not only in its embrace of sustainable development, but also in its desire to change decisionmaking processes. The British approach is globally more compelling, but it is clearly not intended to overexcite, let alone mobilize, an environmental constituency.

Conceptual treatment is merely the first aspect of comparison. What can be said about specific priorities and commitments of money and resources? The British report lists about 75 sets of actions which that government is taking. On closer inspection, however, most of these undertakings are expressed in the form of soft actions "to help," "to urge," "to press for," and "to encourage." The report contains no schedules of action and no commitments of money. The absence of resource commitments is partly a function of the fact that the British proposal was released as a White Paper before the annual budget-approval cycle had been completed. But it also simply reflects a weaker political commitment to environmental issues.

In Canada, DOE was able to garner a considerable resource commitment of $3 bil-

lion over five years. There is some reason to doubt the full staying power of this monetary commitment; indeed, in the February 1991 federal budget, the expenditure commitment was stretched over a six-year period. Nonetheless, it is a significant political achievement — all the more so because it was obtained from a Department of Finance that is still attempting to constrain a fierce federal deficit of well over $30 billion. For its part, Britain's Treasury is flush — in fact, it even ran several surpluses during the 1980s. So there is no doubt which environmental ministry faced the biggest fiscal hurdles and made the greater progress.

The *Green Plan* is also far more forthright in setting out at least some prescribed targets and schedules of action, a selection of which is presented in Box 2. A particularly significant example is the undertaking to pass regulations within five years on 44 priority toxic substances under the provisions of the *Canadian Environmental Protection Act*. Given that only two substances have been regulated during the past 15 years, this is a dauntingly large commitment.

While more is said below about the specific content of the *Green Plan*, it certainly outranks the British document in terms of scope, specifics, and levels of resource commitment. And it fares very well against the plans of other industrialized countries as well, at least as a *statement* of intent.[5] It goes without saying, however, that neither the language used in the two documents nor their resource commitments and schedules tell us whether it is Canada or Britain that is, in fact, the greener society. Only actual, empirical studies will tell us that, and these verdicts would vary on a hazard-by-hazard basis and across the various air, water, and land locales for pollution.

The Environmental Lobby: The "Big Bang" Test of Progress

The third test for the adequacy of green plans is the single-interest agenda of the environmental lobby — the most vivid hue of green. This test is, however, unreasonably absolutist. In the past decade, the Canadian environmental lobby has matured considerably and has come to recognize the realities and complexity of the policymaking process. But it still applies a largely media-driven "big bang" theory of policy progress. Only spectacular announcements of big-ticket spending or regulatory juggernauts are likely to earn applause. Almost everything is tested against norms that too often seem to assume that governments only exist to pursue environmental objectives and that there are no other worthy claims on the public purse.

In the main, Canadian environmentalists have not viewed the *Green Plan* very favorably, in part because of their ingrained habit of applying absolutist criteria. They voice disappointment at the absence in the *Green Plan* of any immediate commitment to impose taxes on activities that add to the greenhouse effect. The plan's failure to adopt *all*, rather than most, of the ideas generated by the prior public hearing process is viewed, not as normal democratic practice, but as a catalogue of failed intentions.

Of course, all interest groups employ such tactics to some extent, but the environmental lobby, in its search for a radical restructuring of society, does tend to use them more than most. Environmentalists practice the studied politics of entrenched impatience. Indeed, some of what the *Green Plan* contains can be credited to this continuous pressure on the part of the environmental lobby, which leads me to suggest that the Canadian lobby is much stronger than its British counterpart.

This raises a further tactical issue, however, which environmental lobbyists too often forget. If they have a deserved stake in the content of the existing *Green Plan*, then it would be in their interest to lend the government some visible nonpartisan support, rather than to indulge in Monday morning quarterbacking. In the 1970s, it was often said — and rightly so — that DOE had failed to develop a supportive external pro-environment constituency. In the 1990s, it may well be that the

Box 2

Selected Activities Contained in the Green Plan

- Regulations on 44 priority toxic substances to be passed within five years, resulting in the "virtual elimination of persistent toxic substances."
- The generation of waste in Canada to be reduced by 50 percent by 2000.
- Emissions of carbon dioxide and other greenhouse gases to be stabilized at 1990 levels by 2000.
- Twelve percent of Canada to be set aside as protected space.
- The National Parks system to be completed by 2000.
- Chlorofluorocarbons (CFCs) to be phased out by 1997, and methyl chloroform by 2000.
- Sulphur dioxide emissions to be reduced by 50 percent in Eastern Canada by 1994. Acid-rain-related emissions in Eastern Canada to be capped beyond 1994. A national cap on emissions to be established by 2000.

shoe will be on the other foot. If the environmental lobby is unrealistically critical of the *Green Plan*, it will weaken its only beachhead *within* the confines of the federal government and bureaucracy, whose constituent parts otherwise remain extremely hostile to environmental progress for reasons set out further below.

Economic Interests and Realities: Will the Money and the "Regs" Hold?

Given the growing public concern over environmental issues in recent years, business has tended to greet the *Green Plan* with an audible sigh of relief. A more interventionist approach, including environmental taxes, was avoided. Many business groups privately believe that the plan is far too expensive, given the state of the Canadian economy, but they are keeping public criticism to the bare minimum. Some of this studied tactical silence is undoubtedly due to their preoccupation with the greening of their own companies. Since the late 1980s, many Canadian firms have begun a serious review of their own environmental practices. Some of this effort has been propelled by the same general public pressure that governments have felt. But much of it has also been due to the even more telling interest of banks, insurance companies, security regulators, and auditors about the current and future environmental liabilities to which a company might be exposed.

There is no doubt that business interest in the *Green Plan* was significant. Some of it was supportive, but much of it was concerned with slowing down the DOE juggernaut that was moving through the Ottawa policy system. Western Canadian oil and gas interests, in particular, fearful of a carbon tax, portrayed the aggressiveness of the DOE bureaucracy as a replay of the interventionist National Energy Program.

The absence of any environment taxes in the *Green Plan* can undoubtedly be attributed to business pressure, but the Finance Department was unlikely to have looked favorably on such measures in any event. This lack of enthusiasm was partly due to analytical uncertainty as to just what kind of environmental taxes to impose. Even more, however, it was due to the concurrent imposition of the goods and services tax (GST) at the department's own forceful instigation. While polls showed that Canadians were tolerant of environmental taxes if the funds thus raised were used for environmental purposes, the Finance Department was certain that voters would punish any government that gave them both a GST *and* environmental taxes, and both in the midst of an economic recession.

But if business was in a defensive posture during the *Green Plan*'s gestation, it is likely to go on the offensive during the much longer implementation phase. And it is in this context

that it is important to pose the question: Will the money and the "regs" hold? By this I mean, will the $3 billion commitment be severely reduced through attrition, and will regulatory initiatives — such as those concerning the 44 priority toxic substances — be stretched out from five to, say, ten years or longer?

With regard to the $3 billion commitment, Table 1 sets out the federal government's broad breakdown of how the money will be spent in relation to *Green Plan* initiatives and categories. This is in addition to the $1.3 billion the government currently spends on the environment.

While some sense of priorities is evident in the *Green Plan*, there is still plenty of room for slippage across these categories. Indeed, there is bound to be some overlap in this kind of presentation as initiatives on air pollution, for example, may contribute to global economic security at the same time. More importantly, however, there is bound to be some attrition in the total resource commitment. Already, the Treasury Board, at the insistence of other suspicious departments and ministers, has ordered DOE to undergo a full review of its existing expenditures before *Green Plan* funds can be spent. This will provide the time to root out some of the lower-priority initiatives.

Past experience is a good guide here. The last time Ottawa had a similarly sized earmarked fund was just after the National Energy Program was announced in 1980. A $4 billion Western Fund was established in anticipation of greatly increased new energy revenues that were expected to accrue to the federal treasury due to the imposition of special energy taxes. The fund almost immediately shrank to one-half its size within a year, when revenues fell short of expectations. It then became the object of a classic competition among Ottawa's expenditure sharks, with departments circling for the kill, anxious to show how they could spend more to benefit the West. Some good came from the fund — most of it was eventually used to alter the Western grain transportation incentive system — but it did shrink.

Table 1
Proposed Expenditure Allocations in the Green Plan
($ millions)

Green Plan Spending Area	Amount
Clean Air, Water and Land	$850
Renewable Resources	350
Special Spaces and Species	175
The Arctic	100
Global Environmental Security	575
Decision Making	500
Starting in Our Own House	275
Emergency Preparedness	175
Total	*$3,000*

The probability of this happening to the "green fund" in the early 1990s is, on one plane, even greater. This is because the federal deficit is now so much higher than it was in 1980, and alternative pressures on the budget — for example, the Gulf War, trade-adjustment costs, support for farmers — will gravitate toward the green money pool. There is, however, one counterpressure that is likely to preserve most of the fund. In the runup to a 1992 election, the green fund is likely to be used as a war chest for the Progressive Conservative government's campaign plan. While this will not preclude some good and sensible environmental initiatives, some pork barrel spending is inevitable — particularly since only 40 percent of the green fund's spending will reside with DOE, with the rest sprinkled through other departments. Though these departments have some environmental responsibilities, they are likely to find ingenious ways to put the money to other uses.

With regard to regulatory initiatives, the most significant in the *Green Plan* undoubtedly is the undertaking to regulate the 44 priority toxic substances. While the plan indicates a desire to experiment with market-based approaches, as suggested mainly by economists and business interests, this aspect is decidedly regulatory.[6] But it is just here that

regulation must be accompanied from the outset by the designed use of market approaches. Given the paucity of regulations in the area of toxic substances, as well as the complexity of the regulatory process and its consultation requirements, this commitment is quite staggering in scope and economic cost with no guarantee of significantly improved environmental results. Forty-four sets of regulations in five years, if carried out only through direct regulation, will produce private sector costs that will dwarf the $3 billion of public spending. For this reason, business is likely to resist strongly each regulation that is proposed. My guess is that only about half of them will be in the process of being promulgated five years from now. If that turns out to be the case, how is one to gauge the success of this regulatory effort in five years? In fact, it could be portrayed as a 50 percent failure when compared with the promises in the *Green Plan* or, alternatively, as a two-thousandfold improvement over the record of the 1980s.

Previous "Megapolicy" Initiatives: Is the *Green Plan* Different?

The first four criteria all more or less gauge the *Green Plan* as a substantive environmental initiative, but simply one of many initiatives in different policy fields. The two remaining criteria, however, move us to a different plane of analysis, to a territory beyond the parameters controlled by the sponsoring department or even the federal government itself.

The first requires a comparison with the fate of other "megapolicy" initiatives, and also that we ask whether the *Green Plan* meets a further extraordinary test. Some of the flavor of this has already been given by the earlier comparison of the *Green Plan* with postwar reconstruction and social welfare initiatives. The question here is: Should the *Green Plan* be likened to this kind of "once-in-a-generation" benchmark policy initiative? Should it be considered, for the century's last decade, the functional equivalent of the postwar Keynesian revolution, albeit without a Keynes?

If so, and there are certainly grounds for doing so, then the *Green Plan* is no mere policy document. It is an agenda-setting effort intended to shift the whole paradigm of public policy debate. As such, it needs to be judged against a longer time frame and for its educational qualities. It is possible, for example, that future environment ministers will rise in the House of Commons to give nationally televised "environment speeches" and to table accompanying environment papers and ways and means legislation, just as finance ministers do with budgets today. This may seem farfetched in 1991, but may not be a decade hence. And the trail of its origins could be seen to begin with the *Green Plan*.

In part, the *Green Plan* deserves to be viewed in this path-breaking fashion, and to this extent the Progressive Conservative government deserves considerable credit. The document does deal with the need for a sea change in the way all institutions make decisions. At the same time, however, by failing to emphasize, up front, such issues as the use of economic incentives, the government's game plan is not as credible as it could have been. This task is all the more necessary, because, unlike the Keynesian revolution and the accompanying social agenda of the postwar reconstruction period, there is now no Keynes. By this I mean that in this era of cynical, mass-media-driven politics, there is no fairly easily communicated and understood theory of basic cause and effect that can be politically communicated and put into operation. (This is not to say that the Keynesian revolution was not in itself full of strong debate and deep controversy — it only looked like a consensus after the passage of many years, and therefore seems clearer with hindsight.)

Because there is no simple cause-and-effect pattern in the environmental policy equation, the *Green Plan* must resort to all-embracing concepts such "sustainable development", "partnerships", and "planning for life". Moreover, it is not possible to attach easy or conventional "left-right" political labels to greening. If the Keynesian period was mildly

left of center in its political orientation and could invoke the evils of capitalism as it was practised in the 1920s and 1930s, this is less feasible for the politics of greening. Capitalism still has its environmental villains to be sure, but so does the state, the citizen as consumer, and the worker as producer. The revolution in Eastern Europe has shown graphically that pollution is at its worst where no one owns anything. Many environmental problems can only be solved if markets are, in fact, created and the price system is utilized. Again, this is why the *Green Plan* needed to educate Canadians in some detail about why regulation alone will not work and why market approaches are the vital complement.

All of the above is made even more difficult by the rampant cynicism that invariably greets any governmental initiative. One newspaper headline blared "The War Drags On," just six days after the coalition air campaign against Iraq began. In the same way, the conduct of modern media-based politics has little tolerance for problems that take years to be defined and solved. The fact is, however, that beginnings must be made. The notion of greening is at its core a radical sea change. In all of these difficult senses, the *Green Plan* deserves some support as a base to build on, regardless of what one thinks of the motivations of its authors and the details of its contents.

Canadian Geopolitics: The *Green Plan* as a National Project

The final criterion against which some judge the *Green Plan* is whether it — or environmental issues in general — can serve as a defining "national project," to use Richard Simeon's phrase, in the wake of the Meech Lake debacle. A national project could be thought of as a major, morally uplifting initiative that gives Canadians from all regions and classes a sense of pan-Canadian achievement. Examples of such projects and bursts of achievement in the past include the construction of the immediate postwar social welfare state and the achievement in the 1960s of medicare and the Canada Pension Plan.

It is argued that the failure of Meech Lake, which came on the heels of a highly divisive free trade battle, has caused Canadians to lose a collective sense of themselves. In many ways, this is the most complex criterion of all and the farthest removed from environmental policy *per se*. It is based on the view that, over the past decade — partly as a result of Progressive Conservative government policy, but partly for other reasons as well — Canadians have lost a sense of national unity and of achieving national projects together.

The Mulroney government has certainly attempted to launch national projects as it sees them, and has partially succeeded in doing so. What with the Canada-U.S. Free Trade Agreement (FTA), two phases of tax reform, and the failed Meech Lake initiative, the Conservatives in Ottawa have not exactly

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been playing it safe. But, on balance, many of these initiatives are seen as having been very divisive and as reducing federal authority in favor either of markets or of the provinces. Thus, a coalition of opposition forces exists that sees Brian Mulroney's party as having made it more difficult to create a new set of nation-defining projects equivalent in impact to those launched in earlier periods. Some see the environment as the leading candidate for national-project status — a status that could be constructed on federal-provincial grounds, rather than on the grounds of an assertive bout of government regulatory intervention.

The opposition group that covets nation-defining projects is centered in the Liberal and New Democratic parties, but it also embraces people who aligned themselves against the FTA under the umbrella of the Pro Canada Network. Many in this coalition privately applaud features of the *Green Plan*, but they are publicly geared to do battle over the plan on larger political grounds. That is, they genuinely believe that the plan, to the extent that it is somewhat more interventionist and more assertive of federal power, is merely a belated attempt by the Mulroney government to rescue itself from its excessive tendency to strip away allegiance to the Canadian nation-state and to undertakings that unite Canadians.

After seven years of Progressive Conservative federal government, it matters not whether this is true or false — the GST is certainly an assertion of federal power — or whether the *Green Plan* is good or bad. The Mulroney government may well have picked the right message for the 1990s — a national action plan on the environment — but it is seen as the wrong messenger, or at least an unconvincing one. The central issue, in the view of the opposition, is to defeat the green messenger on the larger battlefield of the 1980s' Mulroney legacy.

It is difficult to say how the two sides will fare, let alone whether Canada will be greener, in relation to this criterion. If the Conservatives hope to use the *Green Plan* and its $3 billion kitty as their re-election national project, then it is a large calculated risk. On balance, the *Green Plan* does go against the grain of the Conservatives' broad policy thrust of the past seven years. For Liberals and New Democrats who see the environment as their prime candidate for national-project status, the timing of the next federal election will be dicey and not of their choosing.

As to whether the environment issue is itself inherently nation defining, that too is doubtful. It certainly represents a national challenge that Canadians seem anxious to have their governments face. But it is by no means one that could ever be modeled on some simple assertion of federal authority. Jurisdiction over environmental issues is in fact divided, the areas for action are dispersed across the country, and the politics of credit and blame will not be easily predictable. One thing that it clearly will not yield is green political bliss. Indeed, a remarkable "black hole" in the *Green Plan* is its failure to discuss, openly and forthrightly, the issue of federal-provincial jurisdictions. These critical relationships are glossed over in a section with the vague heading of "partnerships".

Conclusions

That there should be several shades of green in attempting to gauge benchmark environmental plans should not be surprising. The judgments made of the federal *Green Plan* must embrace all of the criteria discussed above and no doubt others as well.

In relation to key environmental policy needs, the *Green Plan* fails to deal frontally with the need for the far greater use of market approaches as a complement to traditional regulation. As a result, it is not as convincing as it could have been in showing how the ambitious green regulatory agenda can in fact be implemented at reasonable social cost in an increasingly competitive environment.

On a comparative basis, as a statement of reasonably detailed intentions, the *Green Plan* deserves relatively high marks, for its commitment both to reformed decisionmaking processes and environmental consultation and to

major expenditures. Environmentalists probably would never give it a passing grade according to their criteria. While some of the strength of the *Green Plan* comes from the tenacity of environmentalists, they should not eschew lending some open, nonpartisan public support to the federal effort, since DOE still has few friends in the inner reaches of Ottawa.

In relation to economic criteria, the Tory greenprint has not yet seen the full court press that business is likely to mount as the *Green Plan* moves into the implementation stage. Some attrition undoubtedly will occur in both the $3 billion commitment and in the regulatory agenda on toxic substances, but even partial achievements here will be a vast improvement over the record of the past decade.

As a benchmark paper that attempts to shift the paradigm of debate away from comfortable postwar assumptions, the *Green Plan* deserves serious nonpartisan thought and response. The issues raised will indeed have to be confronted by all Canadians. Whether the *Green Plan* and environmental policy can serve as a unifying national project in the post-Meech Lake era is more problematic. Canadians may well like the challenge of the green message, but may also regard the Mulroney government as an unconvincing messenger.

Notes

1 Canada, *Canada's Green Plan* (Ottawa: Supply and Services Canada, 1990).

2 See G. Bruce Doern, *The Federal Green Plan: Assessing the "Prequel"*, C.D. Howe Institute Commentary 17 (Toronto: C.D. Howe Institute, 1990); and idem, ed., *The Environmental Imperative: Market Approaches to the Greening of Canada*, Policy Study 9 (Toronto: C.D. Howe Institute, 1990).

3 See G. Bruce Doern, *Canadian Environmental Policy: Why Process Is Almost Everything*, C.D. Howe Institute Commentary 19 (Toronto: C.D. Howe Institute, 1990).

4 See United Kingdom, *This Common Inheritance: Britain's Environmental Strategy* (London: Her Majesty's Stationery Office, 1990).

5 For a broader comparison, see Glen Toner, "First Generation Green Plans: The Canadian Experience," *Eco-Decision* 1 (forthcoming).

6 See G. Bruce Doern, ed., *Getting It Green: Case Studies in Canadian Environmental Regulation*, Policy Study 12 (Toronto: C.D. Howe Institute, 1990).

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